

**JUDGE CROTTY**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

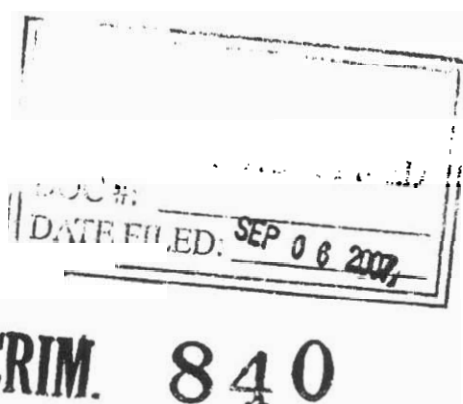
- v. -

GEORGE FRANK MYLES, Jr.,  
a/k/a "George Miles,"

Defendant.

INDIC

07 CRIM. 840



**COUNT ONE**

**(Conspiracy to Violate the Arms Export Control Act ("AECA"))**

The Grand Jury charges:

1. From at least in or about April 2005, up to and including in or about March 2007, in the Southern District of New York and elsewhere, GEORGE FRANK MYLES, Jr., a/k/a "George Miles," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Title 22, United States Code, Section 2778.

2. It was a part and an object of the conspiracy that GEORGE FRANK MYLES, Jr., a/k/a "George Miles," the defendant, and others, known and unknown, unlawfully, willfully, and knowingly, would and did export, and cause to be exported, from the United States to co-conspirators not named as defendants herein located

in Dubai, United Arab Emirates ("UAE") and Bangkok, Thailand, defense articles listed on the United States Munitions List ("USML"), to wit, military aviation parts for, among other things, the F-14 military fighter jet, without having first obtained from the United States Department of State, Directorate of Defense Trade Controls ("DDTC"), a license, or other written authorization, for such export, in violation of Title 22, United States Code, Sections 2778(b)(2) and 2778(c), and regulations promulgated thereunder.

(Title 22, Code of Federal Regulations, Sections 120.6, 120.17, 120.20, 121.1 (category VIII), 123.1, and 127.1).

3. It was further a part and an object of the conspiracy that GEORGE FRANK MYLES, Jr., a/k/a "George Miles," the defendant, and others, known and unknown, unlawfully, willfully, and knowingly, would and did use export control documents, to wit, airway bills, containing false statements and misrepresenting and omitting material facts for the purpose of exporting defense articles and technical data listed on the USML, to wit, military aviation parts for, among other things, the F-14 military fighter jet, in violation of Title 22, United States Code, Sections 2778(b)(2) and 2778(c), and regulations promulgated thereunder

(Title 22, Code of Federal Regulations, Sections 120.6, 120.17, 120.20, 121.1 (category VIII), 123.1, 127.1, and 127.2).

**Overt Acts**

4. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about the following dates, GEORGE FRANK MYLES, Jr., a/k/a "George Miles," the defendant, shipped the following military aviation parts designated as defense articles on the USML to a co-conspirator not named as a defendant herein ("CC-1") in Dubai, UAE and to a co-conspirator not named as a defendant herein ("CC-2") in Bangkok, Thailand:

Date of Shipment	Aviation Part Number	Country of Destination
12/18/06	100941	Dubai, UAE
1/15/07	966512	Dubai, UAE
1/17/07	966512	Dubai, UAE
2/15/07	100941	Dubai, UAE
3/8/07	280986-0002	Bangkok, Thailand

b. On airway bills associated with the above shipments, MYLES misrepresented the value of the content of those shipments.

c. On or about December 27, 2006, February 1, 2007, February 15, 2007, a co-conspirator not named as a defendant herein ("CC-3") arranged for the wire transfer of moneys from Dubai, UAE, through the Federal Reserve Bank of New

York, to MYLES.

(Title 18, United States Code, Section 371.)

**COUNT TWO**

**(Conspiracy to Commit Mail Fraud)**

The Grand Jury further charges:

5. From at least in or about December 2006, up to and including in or about March 2007, in the Southern District of New York and elsewhere, GEORGE FRANK MYLES, Jr., a/k/a "George Miles," the defendant, and others known and unknown, unlawfully, willfully, and knowingly, did combine, conspire, confederate and agree together and with each other to violate the laws of the United States, to wit, to commit mail fraud in violation of Title 18, United States Code, Section 1341.

6. It was a part and an object of the conspiracy that GEORGE FRANK MYLES, Jr., a/k/a "George Miles," the defendant, and others known and unknown, unlawfully, willfully, and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, for the purpose of executing such scheme and artifice, and attempting so to do, to wit, to undervalue the contents of shipments of aviation parts sent from GEORGE FRANK MYLES Jr., a/k/a "George Miles," the defendant, to CC-1 in Dubai, UAE, and to CC-2 in Bangkok, Thailand, would and did deposit and cause to be

deposited any matter and thing whatever to be sent and delivered by any private or commercial interstate carrier, and would and did take and receive therefrom, any such matter and thing, and knowingly would and did cause to be delivered by such carrier according to the direction thereon, any such matter and thing, in violation of Title 18, United States Code, Section 1341.

(Title 18, United States Code, Section 1349.)

**COUNT THREE**

**(Conspiracy to Commit Money Laundering)**

7. From at least in or about December 2006 up to and including in or about March 2007, in the Southern District of New York and elsewhere, GEORGE FRANK MYLES, Jr., a/k/a "George Miles," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i).

8. It was a part and an object of the conspiracy that GEORGE FRANK MYLES, Jr., a/k/a "George Miles," the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, unlawfully, willfully, and knowingly would and did conduct and attempt to

conduct such financial transactions, which in fact involved the proceeds of specified unlawful activity, to wit, mail fraud, in violation of Title 18, United States Code, Section 1341 and illegal export of items falling on the USML, in violation of Title 22, United States Code, Section 2778, (a) with the intent to promote the carrying on of specified unlawful activity, and (b) knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of specified unlawful activity, in violation of Sections 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i) of Title 18, United States Code.

(Title 18, United States Code, Section 1956(h).)

**COUNTS FOUR THROUGH NINE**

**(Arms Export Control Act)**

The Grand Jury further charges:

9. On or about the following dates, in the Southern District of New York and elsewhere, GEORGE FRANK MYLES, Jr., a/k/a "George Miles," the defendant, unlawfully, wilfully, and knowingly exported, and caused to be exported, the following defense articles listed on the USML, from the United States to companies located overseas in the following locations, without having first obtained a license, or other written authorization for such export from the DDTC:

Count	Date of Shipment	Aviation Part Number Shipped	Country of Destination
4	11/15/04	600-1315-002	Madrid, Spain
5	12/18/06	100941	Dubai, UAE
6	1/15/07	966512	Dubai, UAE
7	1/17/07	966512	Dubai, UAE
8	2/15/07	100941	Dubai, UAE
9	3/8/07	280986-0002	Bangkok, Thailand

(Title 18, United States Code, Section 2,  
Title 22, United States Code, Sections  
2778(b)(2), (c); Title 22, Code of Federal  
Regulations, Section 121.1 (Category VIII),  
123.1, 127.1.)

#### FORFEITURE ALLEGATION

10. As the result of committing the mail fraud, money laundering, and Arms Export Control Act offenses in violation of Title 18, United States Code, Sections 371, 1349, and 1956, and Title 22, United States Code, Section 2778, alleged in Counts 1 through 9 of this Indictment, GEORGE FRANK MYLES, Jr., the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offenses, including but not limited to the following:

a. any and all computer and aviation parts seized on or about April 12, 2007, from MYLES' business premises, located at 2521 Northwest 16<sup>th</sup> Lane, Bay E, Pompano Beach, Florida.

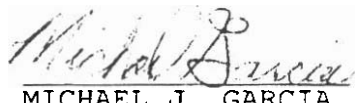
Substitute Asset Provision


11. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981 and  
Title 28, United States Code, Section 2461)

  
MICHAEL J. GARCIA  
United States Attorney

  
FOREPERSON



Form No. USA-33s-274 (Ed. 9-25-58)

---

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

UNITED STATES OF AMERICA

- v -

GEORGE FRANK MYLES, Jr.,  
a/k/a George Miles,

Defendant.

---

INDICTMENT

07 Cr.

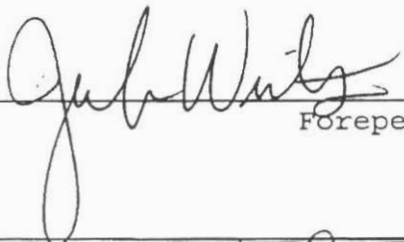
18 U.S.C. §§ 2, 371, 1349, 1956(h);  
22 U.S.C. §§ 2778(b)(2); 22 C.F.R. §  
121.1, 123.1, 127.1

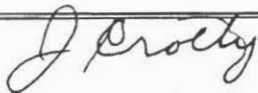
---

MICHAEL J. GARCIA

United States Attorney.

A TRUE BILL

  
Foreperson.

  
H. J. Gorenstein

9/6/07  
SG